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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**NOTICE REGARDING DEPOSITION OF
VARUN KAUSHAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively “Uber”), and Plaintiffs’ Co-Lead Counsel (collectively referred to herein as “the Parties”) respectfully submit this brief response to Plaintiffs’ Notice Regarding the Deposition of Varun Kaushal. Despite briefing the necessity of this deposition to the Court twice (Dkts 3344 and 3412), Plaintiffs today informed the Court they no longer need the deposition.

Uber respectfully requests that the Court hold a hearing on this matter for two reasons. First, Plaintiffs’ Notice omits that while they are forgoing Kaushal, they are “instead” noticing a replacement witness (as well as several additional witnesses). Second, since the parties filed their most recent Joint Submission to the Court, on July 2, 2025, Plaintiffs deposed their first Uber “case-specific” witness. That deposition lasted for five hours and fourteen minutes, with Plaintiffs’ counsel questioning the witness for roughly three-and-a-half hours (across 164 pages of transcript) about general topics before asking any case-specific question.

In light of the foregoing, Uber respectfully submits that the issue of the appropriate scope of case specific depositions remains unsettled and requests that the Court set a further hearing.

DATED: July 7, 2025

Respectfully submitted,

/s/ Laura Vartain Horn

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